

ANTELOPE VALLEY AIR QUALITY MANAGEMENT DISTRICT

TITLE V/ FEDERAL OPERATING PERMITS PROGRAM - PERMITTING PROCEDURES GUIDANCE DOCUMENT

**(updates 07/31/1996, 10/20/1997, 08/24/1998, 03/21/2001, 02/08/2002)
(original issue 3/11/1996)**

This document summarizes various Title V Permit questions or issues answered and resolved to date. It lists various policy or procedure issues relative to the AVAPCD Title V Program and reflects USEPA Guidance Documents, "White Paper for Streamlined Development of Part 70 Permit Applications", July 10, 1995 and "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program", March 5, 1996, implementation within the District's Title V Program. AVAPCD will update this procedures document as USEPA Title V Guidance Continues To Develop.

AVAPCD Title V Federal Operating Permit Procedure Based On USEPA "White Paper" Document and "White Paper Number 2" Document :

Important USEPA Statement outlining the "spirit" of both "White Paper" Documents and this AVAPCD Guidance Document:

"In general, this program (ie Title V) was not intended by Congress to be the source of new substantive requirements. Rather, operating permits required by Title V are meant to accomplish the largely procedural task of identifying and recording existing substantive requirements applicable to regulated sources and to assure compliance with these existing requirements."

A. POTENTIAL TO EMIT (PTE) EMISSION ESTIMATES ARE NEEDED TO DETERMINE At LEAST TWO TITLE V and TITLE III RELATED ISSUES:

- a. Facility PTE emissions estimates will be needed to determine Major Facility Status if actual emissions for NO_x, VOC, PM₁₀ or other regulated air pollutant is less than the applicable major

threshold level (25/100 tpy). Mobile source exhaust emissions are not counted for Title V purposes. Rule 219 permit exempt equipment criteria and HAP emissions must be included in the Title V Applicability Determination for the Facility (see Rule 3001 Facility definition).

- b. Facility Hazardous Air Pollutants (HAPs) PTE emission estimates will be needed to determine Major Facility Status relative to the applicability threshold emission levels for HAPs. The HAPs Title V applicability threshold is 10 tpy (single HAP) or 25 tpy (two or more HAPs). HAP fugitives must be counted in the major source determination. Also, HAP fugitives must be included in the Federal Operating Permit (FOP) application if HAPs are regulated at the facility by a Federal Applicable Requirement (FAR) even though HAPs did not trigger Major Facility status. Mobile source exhaust emissions are not counted for Title V purposes. Rule 219 permit exempt equipment criteria and HAP emissions must be included in the Title V Applicability Determination for the Facility (see Rule 3001 Facility definition).

B. POTENTIAL TO EMIT ISSUES:

- 1. If a facility agrees that it is a Major Facility under Title V, fugitive emissions need not be calculated for determining major source status unless listed by USEPA as an industry type required to document and report fugitive emissions (see item 2 below, (40 CFR 70.3(d))). However, fugitive emission quantification and reporting would be needed if there existed a need to demonstrate compliance with a Federal Applicable Requirement (FAR) or other AVAPCD SIP requirement.

Based on the July 10, 1995 USEPA "White Paper" Guidance Document, Potential to Emit (PTE) emission estimates are not required unless required by a FAR compliance determination or needed for a Title V Applicability Determination. Potential to Emit emission levels will not become federally enforceable limits on Part 70 permits unless otherwise required by a FAR.

- 2. Sources in the following categories must include fugitive emissions when calculating facility Potential To Emit emissions pursuant to 40 CFR 70.3(d).

- A. Coal Cleaning Plants (with thermal dryers)
- B. Kraft Pulp Mills
- C. Portland Cement Plants
- D. Primary Zinc Smelters
- E. Iron and Steel Mills
- F. Primary Aluminum Ore Reduction Plants
- G. Primary Copper Smelters
- H. Municipal Incinerators, capable of charging >250 tons of refuse per day
- I. Hydrofluoric, Sulfuric, or Nitric Acid Plants
- J. Petroleum Refineries
- K. Lime Plants
- L. Phosphate Rock Processing Plants
- M. Coke Oven Batteries
- N. Sulfur Recovery Plants
- O. Carbon Black Plants (furnace process)
- P. Primary Lead Smelters
- Q. Fuel Conversion Plants

- R. Sintering Plants
- S. Secondary Metal Processing Plants
- T. Chemical Process Plants (synthetic organic chemical manufacturing)
- U. Fossil-Fuel Boilers (or combination thereof) , totalling more than 250×10^6 Btu/hr heat input
- V. Petroleum Storage and Transfer Units with a total storage capacity exceeding 300,000 barrels
- W. Taconite Ore Processing Plants
- X. Glass Fiber Processing Plants
- Y. Charcoal Production Plants
- Z. Fossil-Fuel Fired Steam Electric Plants of more than 250×10^6 Btu/hr heat input
- AA. All other stationary source categories regulated by a standard promulgated under § 111 or 112 of the Act, but only with respect to those air pollutants that are regulated for that category.

3. If a facility has two or more SIC categories, only the listed category (40 CFR 70.3(d)) should include non-hazardous air pollutant fugitive emissions in the Title V Permit Application. For example, a hypothetical limestone mine supporting a copper smelter (a listed source), the non-fugitive, but not the fugitive, emissions from the limestone mining operation would be included when calculating the PTE of the entire facility. USEPA considers a "support facility" as part of a source, even if the support facility operates under a different SIC code. A stationary source of emissions is considered a support facility when at least 50 percent of its output is dedicated to the source being evaluated. All the quantifiable fugitive emissions from a facility, or a portion of a facility, that belongs to a listed source category (item 3 above, 40 CFR 70.3(d)) should be included.

C. ACTUAL EMISSIONS REPORTING ISSUES:

1. Point source criteria pollutant "actual" emissions should be reported or properly cited in the Part 70 / Title V Federal Operating Permit Application. The most recent AVAPCD approved facility emission inventory data may be cited if previously submitted to and approved by the AVAPCD.
2. When reporting HAP Actual Emissions, report by CAS # and Name (for public review benefit). HAP actual emissions can be reported by properly citing previously submitted and AVAPCD approved toxics emissions inventory.
3. Based on the USEPA July 10, 1995 Guidance Document, unless regulated by a FAR, or the trigger of Major Facility status, HAP actual emissions do not need to be quantified but should be listed as an emittant from a specified process or operation (see "White Paper" section 2 of page 6 and 7 and above discussions).
4. The "Responsible Official" is required to certify compliance (or non-compliance) with any Federal Applicable Requirement, therefore, it is important that facility officials know actual emission rates for any pollutant for which a FAR applies at the facility. Example calculations should be submitted which demonstrate compliance with facility wide or equipment specific Federal Applicable Requirements. Examples for each type or category of equipment should be submitted but an individual calculation for each specific piece of equipment is not required.
5. When an emission estimate is not required, a general emissions description (a simple list of the significant pollutants or family of pollutants) will suffice. When available, properly cite the most recent AVAPCD approved Emissions Inventory.

D. FUGITIVE EMISSIONS, TITLE V APPLICABILITY, and REPORTING REQUIREMENTS:

USEPA letters dated February 23, 1995 and March 8, 1994 discuss several issues regarding the applicability and reporting of emissions from major stationary sources. Based on discussions with USEPA, CARB and information contained within USEPA letters and the referenced "White Paper" guidance document, facilities with actual emissions that exceed Major Source Title V Applicability need not quantify fugitive toxic emissions if the hazardous air pollutant (HAP) emissions did not trigger Title V Applicability and the HAP emissions at the subject facility are not regulated by NESHAPS, NSPS, SIP Rule or other Federal Applicable Requirements (FAR).

If a facility already concedes Title V major stationary source status, based on the USEPA "White Paper", the facility does not need to quantify and report the HAP emissions as long as the HAP emissions are not regulated at the facility by any FAR. The "White Paper" indicates that a facility process or equipment that emits significant quantities of any listed or regulated air pollutant should have the process identified and pollutants listed in the Part 70 Application (see section 2 of page 6 and 7 of White Paper). Again, a copy of, or proper citation of, the most recent AVAPCD approved criteria, toxics or HAPs emission inventory would meet these requirements. **Please see item # 11, page 7.**

1. Fugitive actual emissions can be reported by submitting a copy of, or properly citing, the most recent AVAPCD approved emissions inventory.
2. Routine "maintenance type emissions" not associated with a facility process (same SIC code) should not be reported. USEPA White Paper cited trivial sources and emissions should not be reported.
3. H₂S is not one of the section 112 (b) (ie. 189 listed HAPs) listed toxic substances. It is a section 112 (r) listed substance (ie. risk management plan).
4. Emissions from exempt equipment regulated by a FAR must be identified and included in the application for FOP's. Rule 219(B) lists the conditions by which specified equipment may be excluded from being listed on or obtaining a permit. Among these is the requirement that air contaminant emissions be less than prescribed threshold values (219(D)). Therefore, in order to determine exempt status, emission calculations would be required. Rule 219 permit exempt equipment criteria and HAP emissions would be necessary to make the Title V Applicability Determination (see Rule 3001 Facility definition).
5. USEPA has stated that Title V and NSR are to be consistent in their implementation. Therefore, mobile source exhaust emissions are not to be included. **Facility haul road, drilling/blasting, etc. fugitive emissions are to be included with overall facility emissions if subject to a FAR, NSR Rule or PM₁₀ SIP Approval.**
6. Only process emissions and fugitives associated with plant equipment and operations need be considered, not maintenance or cleanup type emissions. USEPA White Paper cited trivial sources and emissions should not be reported. The intent of Title V/III is to list Federal Applicable Requirements and document compliance or establish compliance schedules.
7. If a facility has two or more SIC categories, only the listed category should include non-hazardous air pollutant fugitive emissions in the Title V Permit Application. For example, a limestone mine supporting a copper smelter, the non-fugitive, but not the fugitive, emissions from the limestone mining operation would be included

when calculating the PTE of the entire facility. All the quantifiable fugitive emissions from a facility, or a portion of a facility, that belongs to a listed source category (copper smelter) should be included.

AVAPCD TITLE V PERMIT APPLICATION FORMS:

The current AVAPCD Title V Application Forms contain an abundance of facility design and operational data "information request spaces." The applications should be completed in enough detail to enable the AVAPCD to make a "Completeness Determination." In keeping with the "spirit" of the USEPA "White Paper" a Title V Permit Application can be deemed "substantially complete" if enough information is supplied to determine a facility's "Federal Applicable Requirements" (FAR) and compliance status with FARs. In addition, a compliance plan (if required), compliance certification, and signature of the "responsible official" must be submitted.

Districts will have 60 days to determine the "completeness" of each application received. This clock starts from the application received date by AVAPCD. For incomplete applications, the AVAPCD will specify the information missing or needed and a time frame for response. If the applicant fails to provide the information in the requested time frame, the applicant would forfeit the **Application Shield**. The Application Shield protects an operator from being cited for operating without a Title V Permit. To retain the Application Shield, the applicant must submit a complete application to AVAPCD by March 28, 1998. The District recommends that facility operators submit complete Title V applications as early as possible so as to allow time to work out any problems that may arise. Additionally, should AVAPCD request additional information after the Title V application has been deemed complete, the applicant must provide this information in the requested time frame, or again face forfeiting the Application Shield.

A. ADDITIONAL APPLICATION GUIDANCE:

1. Emission unit specific forms 3002-C through 3002-H are required to be submitted. Information available in AVAPCD permits or facility files such as make, model and serial #, horsepower, size, etc. does not need to be listed if the subject equipment or process is adequately described and the proper files are referenced (see section 2, page 7, of "White Paper" Guidance Document). It is the responsibility of the Facility to make sure that information referenced in AVAPCD files is actually in the files. This may require an inspection by the facility of the files to be referenced. Remember that the information (which is not classified confidential) must be readily accessible by the public.
2. The "Responsible Official" is required to certify compliance (or non-compliance) with any Federal Applicable Requirement, therefore, it is important that facility officials know actual emission rates for any pollutant for which a FAR applies at the facility. Example calculations should be submitted which demonstrate compliance with facility wide or equipment specific Federal Applicable Requirements. Examples for each type or category of equipment should be submitted but an individual calculation for each specific piece of equipment is not required. Compliance Certifications must stipulate which FARs the facility is or is not subject to. The District may request additional information to clarify any issues which remain unclear.

3. 100 % compliance is not implied when submitting compliance certifications. Compliance certifications are required of all facilities designating the compliance status with respect to applicable FAR. The Compliance Plan and Monitoring Report Forms are required when a facility needs to outline the non-compliance conditions and steps to be followed to bring the facility back into compliance. Variances should be obtained with necessary steps outlined which, if followed, would lead to reestablishing compliance. This process will not prevent USEPA, AVAPCD, or the public from initiating compliance/enforcement actions deemed necessary as outlined in 40 CFR 70 (see 70.5 & 70.6).
4. AVAPCD permit conditions which have their basis in any AVAPCD Rule (or prior district rule) contained in the SIP or other Federal Applicable Requirements such as National Emission Standards for Hazardous Air Pollutants (NESHAPS), New Source Performance Standards (NSPS), etc. must be included in the Federal Operating Permit. If facility permit conditions "have changed over time" the older requirements would have been replaced by newer requirements as allowed by AVAPCD Rule or USEPA action, therefore the properly approved current version would be incorporated into the FOP.
5. Requirements that are not considered Federally Enforceable may be identified by asterisk and footnote or within the body of the cover letter accompanying the Title V Permit Application.
6. According to USEPA Guidance, when two or more Federal Applicable Requirements apply the most recent and more stringent rule will apply. This is probably the case within AVAPCD, however, if the most recent rule is less stringent, then USEPA is requesting that Districts "hold off" on the issuance of the Title V Permit until this issue is resolved and/or the subject rule is adopted into the SIP. Districts are not required to count such a facility in the required 1/3 of Title V Permits issued per year.
7. AVAPCD does not have USEPA delegation of the PSD/NSR Permit Program. Therefore, include copies of any facility PSD Permits with Title V Applications submitted.
8. Copies of facility AVAPCD permits to operate may be included as an appendix.
9. Applicable Requirements are required to be listed on the Compliance Plan (Form 3002-J) and Compliance Plan Certification (Form 3002-K) forms. In addition, Applicable Requirements applicable only to specific processes or equipment must be adequately described in this listing.
10. It is acceptable to list Federal Applicable Requirements by source category (e.g. boilers greater than 2×10^6 Btu/hr) and attach a list of permit or application numbers identifying the emission units that are subject to those requirements. If unpermitted equipment is subject to Federal Applicable Requirements they must be listed and described in a clear and straightforward manner.
11. Submitting a Facility Summary of the actual emissions from the most recent AVAPCD approved facility emission inventory is optional. If the Facility does not choose to submit a copy of the emission inventory total facility summary the AVAPCD will print out a Facility Summary and include it with the Title V Application when submitted. Facility Total Point Source criteria and HAP pollutant "actual" emissions should be reported in the Part 70 / Title V Federal Operating Permit Application by submitting the summary pages from the most recent facility emission inventory approved by the AVAPCD by attaching the pages to Form # 3002-B2. The most recent AVAPCD approved facility emissions inventory would be cited for more specific details.

When reporting HAP Actual Emissions, report by CAS # and Name (for public review benefit). Based on the USEPA July 10, 1995 Guidance Document, unless regulated by a FAR, or the trigger of Major Facility status, HAP actual emissions do not need to be quantified but should be listed as an emittant from a specified process or operation (see "White Paper" section 2 of page 6 and 7 and above discussions). When an emission estimate is not required, a general emissions description (a simple list of the significant pollutants or family of pollutants) will suffice.

12. Inactive "non operating" permitted emission units should be included in the Title V Application with a note that the emission unit has not been operated (provide dates) and that recent emissions data are not available. Actual emissions would not be reported for these emission units.

Keep in mind that the Potential to Emit for this equipment would be considered in any Title V Applicability Determination but would not otherwise require any emissions reporting once a Facility is considered subject to Title V Permit requirements.

13. Temporary contractor equipment associated with (supporting) the facility that requires a Title V Permit must be identified in the Title V Permit Application for that facility. Unfortunately, there is no current USEPA Guidance that would allow exclusion of temporary contractor equipment. See letter from John S. Seitz to Lisa J. Thorvig, Division Manager, Minnesota Pollution Control Agency, dated November 16, 1994.
14. Leaving blank spaces in the AVAPCD Title V Application Forms is not a problem when the information is adequately stated or contained elsewhere within the application or is otherwise not needed to define or show compliance with a FAR. In addition, blank spaces that are not needed may be deleted as long as the same order is preserved.
15. Title V Permit proposed permit conditions may be included and identified as such on the Compliance Plan (Form 3002-J) and/or Compliance Certification (Form 3002-K) forms or as an attachment.

B. APPLICATION COMPLETENESS DETERMINATION:

An application is incomplete when it does not contain enough information to enable the permit to be processed by the District. To be determined "Complete" a Title V / Federal Operating Permit Application must contain information sufficient to evaluate the emissions, applicable requirements, and compliance status with applicable requirements at the Facility, including but not limited to:

1. Current applicable Rule 312 Federal Operating Permit Fee Assessments must have been paid.
2. Information identifying the facility. Description of processes and products by Standard Industrial Classification Code (SIC). Identification and description of all Permit Units and other points of emissions within the Facility.
3. The amount and type of emissions which render the Facility a Major Facility and the amount and type of emissions for any other Regulated Air Pollutant. Provide in such terms as to establish FARs and compliance with FARs.

4. The amount and type of emissions, in tons per year and in such terms as are necessary to establish compliance with an applicable standard reference test method of any Regulated Air Pollutant.
5. Identification and description of all air pollution control equipment and monitoring devices within the Facility.
6. Information regarding fuels, fuel use, raw materials, process weight, production rates and operating schedules to the extent such information is used to determine or regulate emissions.
7. Any limitations on Facility operations, or common practices within the facility which affect the emissions of Air Pollutants.
8. Any other information specifically required by a Federal Applicable Requirement.
9. Any calculations upon which emissions and compliance determinations are based.
10. Fugitive emissions which are subject to FARs or resulted in an applicability determination shall be included in the application in the same manner as any other emissions. Proper citation in the Title V Application is satisfactory if an emissions inventory has been previously submitted to and approved by the AVAPCD.
11. Citation and description of all Federal Applicable Requirements including a description or reference to test methods used to determine compliance.
12. Any other specific information necessary to implement and enforce other Federal Applicable Requirements or to determine if a requirement is a Federal Applicable Requirement.
13. An explanation of any proposed exemptions from Federal Applicable Requirements.
14. Any additional information determined to be necessary to define alternative operating scenarios or to define permit terms and conditions necessary to implement operational flexibility under District Rule 3003.
15. A Compliance Plan including schedules of compliance with FARs which the facility is currently subject to and FARs which may take effect during the term of the Title V Permit.
16. Certification of Compliance by a responsible official of the truth, accuracy and completeness of forms and information submitted.
17. A list of all activities claimed to be insignificant pursuant to District Rule 219.
18. For portable sources identify all locations of potential operation.

C. FEDERAL APPLICABLE REQUIREMENTS:

The term "federal applicable requirement" are "federally-enforceable requirements" under Title V and include only requirements that are enforceable by EPA and citizens under the federal Clean Air Act. Please see attached "Applicable Federal Requirements Worksheet" document. These requirements include:

- a. New Source Review (NSR) requirements in the State Implementation Plan.

- b. Prevention of Significant Deterioration (PSD) requirements.
- c. New Source Performance Standards (NSPS).
- d. National Ambient Air Quality Standards (NAAQS) for sources permitted pursuant to Section 504(e) of the federal Clean Air Act (CAA).
- e. National Emission Standards for Hazardous Air Pollutants (NESHAPS).
- f. Maximum Achievable Control Technology (MACT) and Generally Available Control Technology Standards (GACT).
- g. A requirement to register a risk management plan under Section 112(r)(7) of the federal CAA.
- h. Solid Waste Incineration requirements (Section 129 of the federal CAA).
- i. Consumer and Commercial Product requirements (Section 183 of the federal CAA).
- j. Tank Vessel requirements (Section 183 of the federal CAA).
- k. District rules that are approved into the state implementation plan (SIP).
- l. Federal Implementation Plan (FIP) Requirements, as required.
- m. Enhanced Monitoring and Compliance Certification requirements (Section 114(a)(3) of the federal CAA).
- n. Acid Deposition Control requirements (40 CFR Parts 72,73, 75, 76, 77, 78).
- o. Stratospheric Ozone Protection requirements (40 CFR Part 82).
- p. Monitoring and analysis requirements (Section 504(b) of the federal CAA).

D. INSIGNIFICANT ACTIVITIES:

Facilities should use the current exemptions listed in Rule 219 - "Equipment Not Requiring A Permit" to specify insignificant activities in the application forms. The District will require that insignificant activities be listed in the applications by category, however, other information such as emissions data will not be required unless the District has reason to request further information. Remember that Rule 219 permit exempt equipment criteria and HAP emissions must be included in the Title V Applicability Determination for the Facility (see Rule 3001 Facility definition).

New and modified stationary sources with net increases in emissions equal to or exceeding "significant" levels (25 tons per year) in District New Source Review Rule are subject to new source review and may not be exempted.

E. CERTIFICATIONS and MONITORING REPORTS:

Facilities should use Certification and Monitoring Report Forms, #s 3002-J1 and 3002-J2, to submit Certifications and any required Monitoring and Compliance Reports. All facilities issued Title V Federal Operating Permits, the responsible officials must complete, certify and submit monitoring reports every six months. The reports must identify deviations from permit requirements, probable causes of deviations, and preventative or corrective actions taken. The reports must cover upset conditions, whether or not they were previously reported to the District.

F. COMPLIANCE PLANS:

For non-complying sources with compliance schedules, the responsible officials must complete, certify, and submit semi-annual progress reports. Form 3002-H "Compliance Plan" must be used for application and reporting purposes.

G. PROVISIONS for "OPERATIONAL FLEXIBILITY":

The provisions for operational flexibility for federally-enforceable permit conditions are contained in Rule 3003. These provisions are intended to meet the mandatory operational flexibility requirements of §502(b)(10) of Title V and §70.4(b)(12) of Part 70.

To qualify under the new provisions, the operational change may not constitute a "modification" as defined under any provision of Title I of the Federal Clean Air Act (42 U.S.C. §7401-§7515) or exceed the emissions currently allowed under the permit. Title I modifications include a modification that is major under federal NSR (e.g. increase of VOC/NOx emissions above 40/25 TPY "de minimis" level), a modification that is major under PSD resulting in a "significant" net emissions increase ("significant" as determined by the U.S. EPA), or a modification at a major HAPs source resulting in a "de minimis" increase of HAPs ("de minimis" as determined by the U.S. EPA). Rules that remain in effect include any current or future AVAPCD or USEPA rule for NSR, PSD, HAPs, NESHAPs, or New Source Performance Standards (NSPS). Any operational change that requires an authority to construct will still need to go through that process. In addition, the operational change must not result in any exceedance of permitted emission limits. Two types of operational flexibility will be allowed.

1. Alternate Operating Scenarios

The first type is for the use of alternative operating scenarios that are allowed for in the permit to operate. The owner/operator of the stationary source has the burden of identifying and applying for the scenarios in the FOP application. The District must make a determination that the scenarios will not violate any applicable District, state, or federal requirement, and then allow for the scenarios in the issued FOP. This type of operational flexibility is already being provided for in the current permit program through the District's authority to construct process. Therefore, there will essentially be no change in the District's current permit to operate program, other than the provisions incorporated into District New Source Review Rule to explicitly accommodate such operational flexibility and adding a FOP requirement for keeping a contemporaneous log to record changes in operating scenarios.

2. Emissions Trading Under a Facility Emissions Limit

The second type of "Operational Flexibility" is to allow for changes in operation of a facility that are not anticipated "before hand" in the FOP. This type of operational flexibility is to allow industry the ability to

make certain expeditious changes in their operations. For example, operational flexibility may be desirable to meet changing market demands quickly without waiting for a change to the FOP. A change under this provision must meet several qualifying conditions. The change must not result in an exceedance of any applicable emission limit, emission standard, or performance standard. Procedurally, the owner/operator must give the District at least a 30-day written notice before making the change. The owner/operator must also provide the District certain information about the change, and must not make the change if a written denial from the District is received during the 30-day notice period. The change must not be a "modification" as defined in Rule 3003 or in Title I of the CAA, and must not violate any applicable federal requirement. The provisions do not allow the contravening of permit conditions for District-only or state requirements.

SUMMARY:

In summary, AVAPCD intends to incorporate the flexibility indicated in the USEPA Guidance Documents "White Paper for Streamlined Development of Part 70 Permit Applications", July 10, 1995 and the "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program", March 5, 1996. In addition, AVAPCD plans to revise and update the AVAPCD Title V Program Application Forms after the initial implementation of the program based on experience gained and any Part 70 Amendments brought about by USEPA. As a result, Part 70 / Title V Permit Applications adequately referencing readily available information contained within AVAPCD permits or stated elsewhere within the Part 70 Permit Applications will be acceptable.

Please contact William H. Weese, Air Quality Engineer / Title V Permitting Coordinator, at (760) 245-1661, extension 1846, should you have additional questions or need further clarification.

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